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Of Attorneys for Debtor-in-Possession

IN THE UNITED STATES BANKRUPTCY COURT

FOR THE DISTRICT OF OREGON

In re

Fizz & Bubble, LLC

Debtor-in-Possession.

Case No. 19-34092-tmb11

DECLARATION OF SARA COBB IN
SUPPORT OF DEBTOR'S RESPONSE
TO UNITED STATES TRUSTEE'S
MOTION UNDER 11 U.S.C. § 1112(b)
TO DISMISS OR CONVERT

I, Sara Cobb, declare and state as follows:

1. I am a certified bankruptcy assistant at the law firm of Vanden Bos & Chapman, LLP. This Declaration is made in support of Debtor's Response to United States Trustee's Motion Under 11 U.S.C. § 1112(b) to Dismiss or Conver.

2. As part of my duties, I routinely perform searches on PACER, as well as file and upload documents in various bankruptcy cases on behalf of our clients. I also compile information from PACER and other sources to create spreadsheets of the data for use by the attorneys at VBC.

3. Attached as **Exhibits A** and **B** to my declaration are spreadsheets which list Chapter 11 open or pending cases before the Bankruptcy Court for the District of Oregon, as well as Chapter 11 closed cases. The purpose of the spreadsheets is to determine the

average length of time it takes from the filing date of the petition to the filing date of the plan and also the average time it takes from the date of filing the petition in the case to the date of confirmation of the plan.

4. I reviewed PACER reports for Chapter 11 cases filed for the time period March 2015 up to the filing date of *In re Body By Pastrami, LLC*, (Case No. 19-34107-tmb11), the case filed 2 days after Debtor's case. I performed a search for closed cases and a search for open cases. Chapter 11 small business cases were not included on the spreadsheets, nor were cases that had been dismissed. The results are set forth on the attached spreadsheets.

I hereby declare that the above statements are true to the best of my knowledge and belief and that I understand the above statements are made for use as evidence in Court and are subject to penalty for perjury.

Dated: March 20, 2020

/s/ Sara Cobb
Sara Cobb, Declarant

OPEN / PENDING CHAPTER 11 CASES

No.	Ch 11 Case	Ch 11 Case No.	Filing Date	Plan Date	Number of Days to Plan Proposal	Confirmation Date	Number of Days - Filing to Confirmation	If not confirmed, No of Days from Filing to 03/20/20
1	Data Systems, Inc.	16-30477-tmb11	2/11/2016	8/8/2016	179	12/7/2016	300	
2	Vern Ray Scovell	17-31213-dwh11	4/3/2017	8/1/2017	120	4/16/2018	379	
3	B. & J. Property Investments, Inc.	19-60138-pcm11	1/17/2019	7/15/2019	180	1/21/2020	370	
4	Shand'e Raeelle Carpenter	19-30990-dwh11	2/6/2019	No	No	No	N/A	408
5	Eric A. Molinar	19-30921-pcm11	3/15/2019	1/9/2020	300	No	N/A	371
6	Casey Ren Mott	19-31388-pcm11	4/16/2019	8/14/2019	120	No	N/A	339
7	15005 NW Cornell LLC	19-31883-dwh11	5/21/2019	10/18/2019	151	No	N/A	304
8	4 Him Food Group, LLC	19-62049-tmr11	7/2/2019	No	No	No	N/A	262
9	Wall to Wall Tile & Stone, LLC	19-32600-dwh11	7/16/2019	No	No	No	N/A	248
10	North Pacific Canners & Packers, Inc.	19-62584-pcm11	8/22/2019	2/20/2020	182	No	N/A	211
11	Fizz & Bubble, LLC	19-34092-tmb11	11/4/2019	No	No	N/A	137	
	AVERAGE				176	349.67	374	

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CLOSED CHAPTER 11 CASES

No.	Ch 11 Case	Ch 11 Case No.	Filing Date	Plan Date	Number of Days to Plan Proposal	Confirmation Date	Number of Days - Filing to Confirmation
1	Nolan Town Center, LLC	15-33273-rlld11	7/6/2015	1/29/2016	207	5/3/2016	302
2	John Charles Sanborn	15-33749-tmb11	8/3/2015	11/23/2015	112	3/30/2016	240
3	Rick L. & Lisa H. Hardin	15-34223-tmb11	10/8/2015	3/3/2016	147	1/30/2017	480
4	William Gert Schmidt, Jr.	15-34445-rlld11	9/20/2015	10/26/2015	36	3/15/2016	177
5	Donald Nelson Bauhofer	16-30020-tmb11	1/6/2016	4/20/2016	105	8/16/2016	223
6	DePaul Industries	16-32293-pcm11	6/10/2016	11/10/2016	153	5/1/2017	325
7	Peak Web LLC	16-32311-pcm11	6/13/2016	10/11/2016	120	4/14/2017	305
8	Townridge, Inc.	16-32482-tmb11	6/25/2016	11/26/2016	154	5/18/2017	327
9	Lowell & Sons, LLC	16-33707-tmb11	9/27/2016	6/12/2017	258	12/21/2017	450
10	Patricia Lynn Hayden	16-34221-dwh11	11/4/2016	12/29/2016	55	10/17/2017	347
11	Wittke, Lowell and Judy	17-33812-tmb11	10/11/2017	4/2/2018	173	10/5/2018	359
12	Cathleen Carole Walker	17-33888-dwh11	10/17/2017	2/14/2018	120	8/13/2018	300
13	Mark E. Delong	17-34395-pcm11	11/28/2017	4/12/2018	135	10/19/2018	325
14	Sunshine Wind Down, LLC	18-31644-pcm11	5/9/2018	3/5/2019	300	8/15/2019	463
15	Sammy James Hassan	18-33561-tmb11	10/15/2018	2/12/2019	120	10/8/2019	358
	AVERAGE:				146.33		332.07

EXHIBIT B - Page 1 of 1

In re Fizz & Bubble, LLC
Bankruptcy Case No. 19-34092-tmb11

CERTIFICATE - TRUE COPY

DATE: March 20, 2020

DOCUMENT: DECLARATION OF SARA COBB IN SUPPORT OF DEBTOR'S
RESPONSE TO UNITED STATES TRUSTEE'S MOTION UNDER
11 U.S.C. § 1112(B) TO DISMISS OR CONVERT

I hereby certify that I prepared the foregoing copy of the foregoing and have carefully compared the same with the original thereof and the foregoing is a correct copy therefrom and of the whole thereof.

CERTIFICATE OF SERVICE

I hereby certify that I served a copy of the foregoing on:

Fizz & Bubble, LLC Attn: Kimberly A. Mitchell 27120 SW 95th Ave., Ste. 3280 Wilsonville, OR 97070	Lloyd R. DuBois 0932 SW Palatine Hill Rd. Portland, Oregon 97219	Bruce Wood 510 SW 5th Ave., Suite 300 Portland, Oregon 97204
Oswego Financial Services Attn: Glenn J. Smith 4091 Coltsfoot Lane Lake Oswego, OR 97035	Express Employment Professionals Wayne Marschall 7401 SW Washo Court, Suite 200 Tualatin, Oregon 97062	Diane M. Humke 32272 Apple Valley Rd Scappoose, OR 97056

Mike Vanier
7650 Beveland Street, Suite 170
Portland, Oregon 97223

by mailing a copy of the above-named document to each of the above in a sealed envelope addressed to the last known address. Each envelope was deposited into the postal system at Portland, Oregon, on the below date, postage prepaid.

I hereby certify that the foregoing was served on all CM/ECF participants through the Court's Case Management/Electronic Case File system on the date set forth below.

Dated: March 20, 2020

VANDEN BOS & CHAPMAN, LLP

By:/s/Douglas R. Ricks

Douglas R. Ricks, OSB 044026
Of Attorneys for Debtor-in-Possession